

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

**DEFENDANTS' UNOPPOSED NOTICE TO EXTEND BRIEFING SCHEDULE FOR
PLAINTIFF'S AMENDED COMPLAINT**

Defendants WGCZ Limited, s.r.o. (“WGCZ Limited”), WGCZ Holding, a.s. (“WGCZ Holding”), WebGroup Czech Republic, a.s. (“WebGroup”), NKL Associates, s.r.o. (“NKL”), Webprocessing s.r.o. (“Webprocessing”), and Bridgemaze Partners s.r.o. (Bridgemaze) (collectively “Defendants”),¹ respectfully notify the Court that the parties have agreed to modify the briefing schedule for Plaintiff’s Amended Complaint (ECF No. 32). In support of this Motion, Defendants state as follows:

1. On August 1, 2022, Plaintiff Preservation Technologies LLC filed its Amended Complaint, which added four parties and a substantial number of new factual allegations. (ECF

¹ WebGroup, NKL, Webprocessing, and Bridgemaze have not yet been served or made appearances in this case; however, counsel is representing those parties for purposes of this Notice.

No. 32). The parties initially agreed that Defendants' responsive pleading would be due on September 6, 2022. (ECF No. 33).

2. Defendants now seek, and Plaintiff does not oppose, an additional seven days to respond to Plaintiff's Amended Complaint, such that the responsive pleading would be due on September 13, 2022.

3. Defendants likewise do not oppose a one-week extension for Plaintiff to respond to Defendants' responsive pleading, which would make Plaintiff's response due on December 9, 2022, and Plaintiff does not oppose a corresponding one-week extension for Defendants to file a reply, to December 23, 2022.

4. This Notice is not filed for the purpose of delay, but solely to promote judicial economy and to permit Defendants a brief amount of additional time to file their responsive pleading.

THEREFORE, Defendants respectfully notice that their deadline to respond to Plaintiff's Amended Complaint (ECF No. 32) is September 13, 2022; that Plaintiff's response deadline is December 9, 2022; and Defendants' reply deadline is December 23, 2022.

Dated: September 6, 2022

Respectfully submitted,

/s/ Michael T. Zeller

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CERTIFICATE OF SERVICE

I hereby certify that, on September 6, 2022, I served the foregoing electronically to all counsel of record.

/s/ Michael T. Zeller

Michael T. Zeller